UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA

No. 21 CR 618

v.

Honorable Martha M. Pacold

CHARLES LIGGINS, et al.

GOVERNMENT'S MOTION FOR A STATUS HEARING

The UNITED STATES OF AMERICA, by its attorney, ANDREW S. BOUTROS, United States Attorney for the Northern District of Illinois, respectfully moves for a status hearing in this matter in order to set dates for the defendants' sentencings and to address the defendants' requests for oral argument on their post-trial motions. The government incorporates its prior filings on this issue (Dkt. 617, 618) into this motion by reference.

As of June 18, 2025, each defendants' sentencing was scheduled for a date in either August or September 2025. U.S. Probation submitted the Presentence Investigation Reports for the defendants on June 18, June 23, July 1, July 2, and July 15, 2025. Dkt. 591, 593, 595, 598, 601, 607. Thereafter, Charles Liggins, Kenneth Roberson, Tacarlos Offerd, Christopher Thomas and Marcus Smart's sentencings were rescheduled to dates in October 2025, November 2025, December 2025, and January 2026. Dkt. 600, 603, 605, 609, and 613. Several weeks before Ralph Turpin's sentencing, which was set for August 26, 2025, Turpin moved to convert his sentencing to oral argument in support of his post-trial motion, noting the government's objection to his request in his motion. Dkt. 614. The Court granted

Turpin's motion on August 20, 2025 (and later struck the date for Turpin's sentencing on August 25, 2025, Dkt. 616), and directed the parties to submit a status report by September 4, 2025, with, for any party requesting oral argument (all defendants are now requesting oral argument): (1) proposed dates that work for the parties, (2) the parties' proposals for the (a) format and (b) time estimates for the argument, (3) any request for a status hearing (if the parties would like to discuss the plan for the argument in addition to or in lieu of the joint status report), and (4) any other matters the parties would like to raise. Dkt. 615.

The parties filed two status reports on September 4, 2025, setting forth the parties' proposals, illustrating the challenges in arriving at an agreed format, and requesting a status conference to discuss the matter. Dkt. 617, 618. No sentencings or other dates are currently scheduled in this matter. Dkt. 616, 619, 620.

The government, through this motion, is respectfully renewing its request for a status hearing.

Respectfully submitted,

ANDREW S. BOUTROS United States Attorney

By: /s/ Jason A. Julien

JASON A. JULIEN ANN MARIE E. URSINI CAITLIN WALGAMUTH SEAN HENNESSY Assistant United States Attorneys 219 S. Dearborn Street, Rm. 500 Chicago, Illinois 60604 (312) 886-4156

CERTIFICATE OF SERVICE

I, Jason A. Julien, an attorney, certify that I served a copy of the foregoing Government's Motion for a Status Hearing by filing the same using the CM/ECF System, and that a copy will be provided to all parties of record designated to receive notice.

Respectfully submitted,

ANDREW S. BOUTROS United States Attorney

By: /s/ Jason A. Julien

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